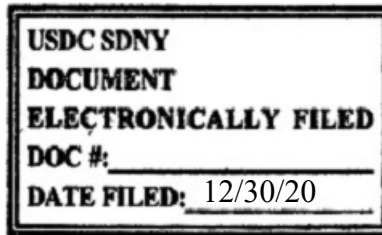




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December 29, 2020

BY CM/ECF

Honorable Barbara Moses, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

Re: *Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al.*, 18-cv-1781  
*Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2006-4 et al.*, 18-cv-7692  
*Butry et al. v. Nat'l Collegiate Student Loan Trust 2005-3 et al.*, 20-cv-5843

Dear Judge Moses:

We represent the National Collegiate Student Loan Trust Defendants in the above-referenced consolidated actions. We write on behalf of all parties to request extension of the current January 4, 2021 fact-discovery deadline in *Michelo* and *Bifulco*.

The parties will not meet the January 4 discovery deadline previously set by the Court and require more time. Among other reasons, Defendants have five current and former employee fact deponents who cannot testify before January 4. Additional time is also needed for Defendants to produce documents, including documents concerning the CFPB investigation. There are also four named plaintiffs and subpoenaed family members who have not yet been deposed; Plaintiffs previously proposed dates for these individuals but the parties could not find mutually agreeable dates.

The parties therefore request extension of the deadline as follows: the time to produce documents, is extended to Feb. 5, 2021; to conduct depositions, to Feb. 22, 2021; for Plaintiffs' class certification motion, to May 3, 2021; for Defendants' Opposition thereto, to July 12, 2021; and for the Reply thereto, to August 13, 2021

Thank you for the Court's attention to this matter.

Hon. Barbara Moses, U.S.M.J.  
December 29, 2020  
Page 2

Respectfully,

*/s/ Gregory T. Casamento*

Gregory T. Casamento

cc: All counsel of record (by CM/ECF)

Application GRANTED. SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Barbara Moses', is written over a horizontal line.

Barbara Moses, U.S.M.J.  
December 30, 2020